

**Exhibit “F”**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOUTHEASTERN SOLUTIONS SES INC.,

Plaintiff

-against-

ICON REALTY NY CORP.; HOLLYWOOD STYLZE  
SALON, LLC; RANCH MINI MARKET & DELI INC.;  
V.I.P. NAILS SALON BY LINDA, INC.; THE CITY OF  
NEW YORK ENVIRONMENTAL CONTROL BOARD;  
FLAGSTAR BANK, N.A. as Successor in Interest to New  
York Community Bank

Defendants.

Docket #1:24-cv-08995

**REPLY TO  
COUNTERCLAIMS**

Plaintiff, by its attorneys, Shiryak, Bowman, Anderson, Gill & Kadochnikov, LLP hereby  
replies to Defendant Icon ("Icon") Realty NY Corp as follows:

1. Paragraph 80 of Plaintiff's counterclaim contains a quote of the statute to which no  
response is required.
2. Plaintiff denies the allegations contained in Paragraph 81 of Icon's counterclaim.
3. Plaintiff denies the allegations contained in Paragraph 82 of Icon's counterclaim.

**WHEREFORE**, Plaintiff demands judgment against Defendants as follows:

- a) Judgment for the relief stated in Plaintiff's complaint.
- b) Dismissal of Icon's Counterclaim.
- c) That plaintiff may have such other and further relief as may be just and equitable.

Dated: Kew Gardens, New York  
February 4, 2025



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**Alexander Kadochnikov**

Shiryak, Bowman, Anderson, Gill & Kadochnikov, LLP

*Attorney for the Plaintiff*

80-02 Kew Gardens Rd, Suite 600

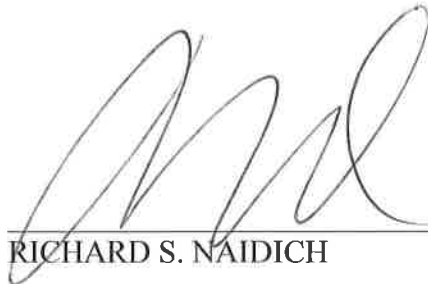
Kew Gardens, NY 11415

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CERTIFICATE OF SERVICE

Richard S. Naidich, an attorney duly admitted in the United States District Court for the Southern District of New York hereby certifies that on February 13, 2025 I served a copy of the within Notice of Motion, Declaration, exhibits and Memorandum of Law upon counsel for plaintiff via ecf and upon all other defendants, none of whom have appeared by United States Mail postage prepaid.



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RICHARD S. NAIDICH